

UNSEALED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MONIQUE DA SILVA MOORE,  
MARYELLEN O'DONOHUE,  
LAURIE MAYERS, HEATHER  
PIERCE, and KATHERINE  
WILKINSON on behalf of themselves  
and all others similarly situated,

PLAINTIFFS,

v.

PUBLICIS GROUPE SA and  
MSLGROUP,

DEFENDANTS.

Civ No. 11-CV-1279 (ALC) (AJP)

**DECLARATION OF SIHAM NURHUSSEIN IN SUPPORT OF PLAINTIFFS' MOTION  
FOR CONDITIONAL CERTIFICATION AND AUTHORIZATION OF NOTICE**

SIHAM NURHUSSEIN, an attorney duly admitted to practice law in the State of New York, in the Southern District of New York, states as follows:

1. My firm represents the Plaintiffs in the above-referenced action.
2. Annexed to this declaration as "Exhibit A" is a true and correct copy of Plaintiffs' Proposed Second Amended Complaint.
3. Annexed to this declaration as "Exhibit B" is a true and correct copy of the Report of Dr. Janice Madden and Dr. Alex Vekker, titled "Evaluating Whether the Compensation of Vice Presidents-Business Unit and Senior Vice Presidents at Publicis Groupe Differs by Gender."
4. Annexed to this declaration as "Exhibit C" is a true and correct copy of *Collins v. Dollar Tree Stores, Inc.* (N.D. Ala. Dec. 12, 2008).

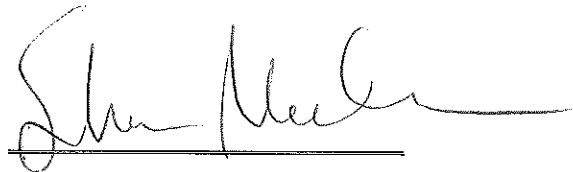
5. Annexed to this declaration as “Exhibit D” is a true and correct copy of the relevant pages of Defendants’ Janus Book, documents Bates stamped PUBLICIS00000848-853, 927-929.
6. Annexed to this declaration as “Exhibit E” is a true and correct copy of the relevant pages of the 30(b)(6) deposition of Geraldine Heldring, dated January 13, 2012.
7. Annexed to this declaration as “Exhibit F” is a true and correct copy of Defendants’ Pay for Performance Guide, documents Bates stamped MSL000804 – 807.
8. Annexed to this declaration as “Exhibit G” is a true and correct copy of the relevant pages of the 2011 Council of Public Relations Firms Domestic Compensation Survey, documents Bates stamped MSL004128, 4160-4161.
9. Annexed to this declaration as “Exhibit H” is a true and correct copy of the relevant pages of the 2010 Mercer Global Compensation Survey, documents Bates stamped MSL002772, MSL002917-2920.
10. Annexed to this declaration as “Exhibit I” is a true and correct copy of Defendants’ Salary Band Data, documents Bates stamped MSL004950-4970.
11. Annexed to this declaration as “Exhibit J” is a true and correct copy of Defendants’ Job Descriptions for Vice Presidents, Senior Vice Presidents, Practice Directors, and North America Practice Directors, documents Bates stamped MSL001150-1151, MSL001146-1147, MSL001138-1139.
12. Annexed to this declaration as “Exhibit K” is a true and correct copy of the relevant pages of Defendants’ 2009 and 2011 Performance Management Program (“PMP”) Presentations, documents Bates stamped MSL004583, 4589, 4756, 4763.

13. Annexed to this declaration as "Exhibit L" is a true and correct copy of Defendants' Promotion Recommendation Process, documents Bates stamped MSL004990-4991.
14. Annexed to this declaration as "Exhibit M" is a true and correct copy of the relevant pages of the deposition of Heather Pierce, dated December 7, 2011.
15. Annexed to this declaration as "Exhibit N" is a true and correct copy of the relevant pages of the deposition of Monique da Silva Moore, dated January 13, 2012.
16. Annexed to this declaration as "Exhibit O" is a true and correct copy of the relevant pages of the deposition of MaryEllen O'Donohue, dated February 10, 2012.
17. Annexed to this declaration as "Exhibit P" is a true and correct copy of the relevant pages of the deposition of Carol Perlman, dated January 18, 2012.
18. Annexed to this declaration as "Exhibit Q" is a true and correct copy of the Declarants' Pay Comparison Chart.
19. Annexed to this declaration as "Exhibit R" is a true and correct copy of Defendants' Job Code Data Dictionary.

I DECLARE UNDER THE PENALTIES OF PERJURY THAT THE FOREGOING IS TRUE AND ACCURATE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated: February 29, 2012

New York, New York

A handwritten signature in black ink, appearing to read "Siham Nurhussein", written over a horizontal line.

Siham Nurhussein